

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of the Amateur Service Rules to)	RM-11325
Facilitate Use of Spread Spectrum)	
Communications Technologies)	

REPLY COMMENTS

Dated: April 6th, 2006

The Commission very often denies petitions with the comment, that *“the proposal is premature.”* That comment pretty much defines the Automatic Power Control (APC) law written into Part 97.311(d). There is no Automatic Power Control in Amateur Radio Spread Spectrum today. There hasn’t been in the past, and it seems likely that there will never be one in the future.

DISCUSSION

- (1) Currently 97.313(a) states that *“An amateur station must use the minimum transmitter power necessary to carry out the desired communications.”*
- (2) While the ARRL petition seeks to remove Automatic Power Control (APC) it leaves the 100 Watt power limit of 97.311(d) in place. This whole section is redundant to 97.313(a) and I propose here that 97.313(d) be completely eliminated.
- (3) Amateurs may want to use more than 100 Watts, especially if they raise their antenna systems point well above the horizon, such as Earth-Moon-Earth or interplanetary communications (such as transponders on Mars). 100 Watts is an arbitrary power.
- (4) The facts are, that Amateur Radio Part 97 spectrum is mixed with Part 15 spectrum, and Amateurs are quick to adapt commercial products to their own use. Today there are millions of citizens using Part 15 spectrum. They use that spectrum because everyone suffers the same interference, and it is generally good enough. This won’t be true if Amateurs start hooking on amplifiers. Even 10 watts is going to affect whole cities, and 100 watts is going to increase the FCC workload in complaints processing. Forces will rise to produce a solution for this mixed service. To that end, I propose that

power be limited in spectrum shared with Part 15 users with the following amendment:

97.313(i) No station shall use external amplifiers with commercial equipment designed for Part 15 spectrum use within the Amateur Radio Part 97 Service.

(5) The spectrum authorized for Spread Spectrum is also arbitrary. There is no spectrum authorized to experiment with Shortwave Propagation. One of the early experiments conducted by a Special Temporary Authority (STA) was Frequency Hopping spread spectrum. To that end, I propose the following amendment:

97.305(c) Add SS (spread spectrum) emission to the 10 metre band.

10 m	28.0-28.3 MHz	RTTY, SS, data	(4)
-do-	28.3-28.5 MHz	Phone, image, SS	(1) , (2) , (10)
-do-	28.5-29.0 MHz	Phone, image, SS	(1) , (2)
-do-	29.0-29.7 MHz	Phone, image, SS	(2)

Respectfully Submitted,

Steven R. Sampson, K5OKC
5600 SE 83rd St.
Oklahoma City, OK 73135